

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF OHIO  
EASTERN DIVISION

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2013 APR 25 PM 3:56

U.S. DISTRICT COURT  
SOUTHERN DIST. OHIO  
EAST. DIV. COLUMBUS

UNITED STATES OF AMERICA,

vs.

ADDISON R. RICHARDSON

CASE No. : 2:13-cr-105

JUDGE: SARGUS

18 U.S.C. § 2

18 U.S.C. § 1519

18 U.S.C. § 2252(a)(4)(B)

18 U.S.C. § 2253(a)(1) and (3)

18 U.S.C. § 2422(b)

INDICTMENT

THE GRAND JURY CHARGES:

COUNT ONE

From on or about January 22, 2013, through on or about February 11, 2013, in the Southern District of Ohio, the defendant, **ADDISON R. RICHARDSON**, did use a means or facility of interstate commerce, that is, the Internet and a cellular phone, to attempt to knowingly persuade, induce or entice an individual, whom the defendant believed to be a 9-year-old male, to engage in any sexual activity for which the defendant can be charged with a criminal offense.

In violation of 18 U.S.C. § 2422(b).

### COUNT TWO

From on or about January 22, 2013, through on or about February 11, 2013, in the Southern District of Ohio, the defendant, **ADDISON R. RICHARDSON**, did use a means or facility of interstate commerce, that is, the Internet and a cellular phone, to attempt to knowingly persuade, induce or entice an individual, whom the defendant believed to be a 14-year-old male, to engage in any sexual activity for which the defendant can be charged with a criminal offense.

In violation of 18 U.S.C. § 2422(b).

### COUNT THREE

On or about February 11, 2013, in the Southern District of Ohio, the defendant, **ADDISON R. RICHARDSON**, knowingly possessed matter, that is, digital files stored on an Apple I-Phone 5, bearing IMEI number 990002718975921, that contained one or more visual depictions that had been transported using any means or facility of interstate or foreign commerce, including the Internet, the production of such visual depictions having involved the use of minors engaging in sexually explicit conduct, and such visual depictions being of such conduct.

In violation of 18 U.S.C. § 2252(a)(4)(B).

### COUNT FOUR

From on or about March 29, 2013, through on or about March 31, 2013, in the Southern District of Ohio and elsewhere, the defendant, **ADDISON R. RICHARDSON**, did knowingly and intentionally alter, destroy, mutilate and conceal a tangible object with the intent to impede, obstruct, and influence the investigation of a matter within the jurisdiction of a department or

agency of the United States; to wit, the defendant knowingly and intentionally threw away and caused to be thrown away, an LG 440 TRACFONE, with the intent to impede, obstruct and influence the investigation of **ADDISON R. RICHARDSON** for violations of federal laws pertaining to the sexual exploitation of children conducted by the United States Federal Bureau of Investigation and the United States Department of Homeland Security Investigations.

In violation of 18 U.S.C. §§ 1519 and 2.

#### **FORFEITURE A**

The allegations of Count One of this Indictment are hereby incorporated by reference as part of this Count as if fully rewritten herein for purposes of alleging forfeitures to the United States of America pursuant to the provisions of 18 U.S.C. § 2428.

As a result of the offense alleged in Count One of this Indictment, and upon conviction thereof, Defendant **ADDISON R. RICHARDSON** shall forfeit to the United States:

- (a) all property used and intended to be used to commit and to promote the commission of the aforementioned violations, including the following:

1. Apple I-Phone 5, bearing IMEI number 990002718975921.

In violation of 18 U.S.C. § 2428 (a)(1) and (b)(1)(A).

#### **FORFEITURE B**

The allegations of Count Two of this Indictment are hereby incorporated by reference as part of this Count as if fully rewritten herein for purposes of alleging forfeitures to the United States of America pursuant to the provisions of 18 U.S.C. § 2253.

As a result of the offense alleged in Count Two of this Indictment and upon conviction thereof, Defendant **ADDISON R. RICHARDSON** shall forfeit to the United States:

(a) all matter containing said visual depictions or child pornography and child erotica, transported, mailed, shipped and possessed in violation thereof; and,

(b) all property used and intended to be used to commit and to promote the commission of the aforementioned violation, including but not limited to the following:

1. Apple I-Phone 5, bearing IMEI number 990002718975921.

In violation of 18 U.S.C. § 2253(a)(1) and (3).

A TRUE BILL.

s/Foreperson  
FOREPERSON

CARTER M. STEWART  
United States Attorney



GARY A. SPARTIS (0023428)  
Columbus Branch Chief